

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 )  
v. ) Criminal No: 10CR10275DPW  
 )  
JOSE LUIS BAEZ )  
 )

MOTION TO CONTINUE

Now comes the Defendant and respectfully requests that this Honorable Court continue the above captioned matter, currently scheduled for Monday, December 20, 2010 at 2:00 p.m. for conference call among the Honorable Justice Timothy S. Hillman, Assistant United States Attorney David G. Tobin, and Attorney Philip J. Doherty until any of the following dates:

January 24, 2011 (Boston or Worcester)  
January 25, 2011, 2:00 (Boston)  
January 26, 2011 (Boston or Worcester)  
January 27, 2011 (Boston or Worcester)

for either conference call or court appearance at the discretion of the Court.

As reasons hereof, the Defendant states the following:

1. Attorney Murat Erkan and Attorney Michael P. Ruane entered appearances on this matter on December 14, 2010.
2. Counsel requires time to contact the Defendant's prior counsel, Attorney Philip Doherty, to obtain copies of the government's discovery and materials provided to the Defendant to date.

3. Counsel requires time to review the discovery, which is lengthy, and familiarize themselves with the government's evidence.

4. The Defendant agrees to waive speedy trial for purposes of this continuance.

Respectfully submitted,  
Jose Luis Baez,  
By and through his attorney,

/s/ Michael P. Ruane  
Michael P. Ruane, BBO: 641308  
300 High Street  
Andover, MA 01810  
(978) 475-6112

Dated: December 14, 2010

CERTIFICATE OF SERVICE

I, Attorney Michael P. Ruane, counsel for the Defendant, Manuel Lara, hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 14, 2010.

/s/ Michael P. Ruane  
Michael P. Ruane, Esquire

Date: December 14, 2010